

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

IN RE	)	
ESTATE OF FERDINAND E. MARCOS	)	MDL No. 840
HUMAN RIGHTS LITIGATION	)	No. 86-390
	)	No. 86-330
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THIS DOCUMENT RELATES TO	)	
Hilao et al. v. Estate of	)	
Ferdinand E. Marcos,	)	
	)	
and	)	
	)	
DeVera et al. v. Estate of	)	
Ferdinand E. Marcos,	)	
	)	

DECLARATION OF DR. CHRISTOPH VON GRAFFENRIED  
IN SUPPORT OF JOINT PETITION FOR  
ATTORNEY'S FEES AND REIMBURSEMENT OF EXPENSES

Dr. Christoph von Graffenried, attorney at law, Bellerive-  
strasse 10, P.O. Box, CH-8034 Zurich, Switzerland, deposes  
and states:

1. I am an attorney in the law firm of Hüssy von Graffen-  
ried & Partner, counsel for the Plaintiff Class in the  
above-captioned action.
2. I make this Declaration in support of my application for  
an award of attorney's fees for services rendered to the  
Class certified in the above-captioned litigation, for  
reimbursement of expenses reasonably incurred in the  
course of the representation. I served as local counsel  
in Switzerland during 1993, 1994 and 1995 to prosecute  
Letters Rogatory and appeals in three jurisdictions (Zu-  
rich, Freiburg and Geneva) filed in connection herewith.

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3. I have not been paid for any of my legal services to date.
4. During the period from April 1993 to September 1995 I performed 88.32 hours of work in connection with this litigation. Based upon historic hourly rates ordinarily charged to my clients for comparable proceedings, the lodestar value of the time is the equivalent of USD 25,406. Attached hereto as Exhibit A is a detailed itemization of my time.
5. During the period of my services I incurred expenses in the equivalent of USD 477.40. These expenses were reasonably and necessarily incurred in connection with this litigation, have not been reimbursed and are detailed in Exhibit A.
6. All of the services performed by my Firm and local counsel in connection with this litigation were under the direction of Lead Counsel and reasonably necessary in the prosecution of this case.
7. There has been no unnecessary duplication of services for which the Firm now seeks compensation. There were no instances in which two or more attorneys in my firm participated in any matter.
8. The rate at which I seek compensation is my usual and customary hourly rates charged for work performed for other clients in comparable proceedings.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

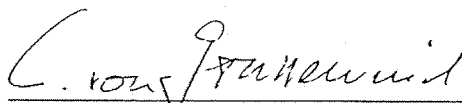
  
Dr. Christoph von Graffenried

EXHIBIT A

Honorar für Kohn, Swift & Graf E.C. ab dem 31.03.93  
 Kit: Kürzel KSC AS monatlich  
 erstellt am 02.07.99 Dr. Christoph von Graffenried Name des Benachteiligten/Honorarbestimmten Klienten

Mandatsbezeichnung	Datum	Leistung	Zeit in Minuten
KSG/marcos	05.04.93	Tel. Swift	24
	05.04.93	Tel. Fed.off.of police	18
	06.04.93	Tel. FOP/judge/Distr.atty.	60
	06.04.93	legal research re letters. rog.	60
	07.04.93	Tel. dtl.	30
	15.04.93	conf. in Philadelphia	120
	19.04.93	legal research re letters rog.	90
	19.04.93	Tel. dtl.	18
	28.04.93	Tel. dtl.	18
	07.05.93	Tel. Cosandey, distr. Atty, study doc.	18
	10.05.93	Tel. Swift	18
	10.05.93	Tel. Cosandey, distr. Atty.	30
	12.05.93	legal research re Art.271 CrimCode, Fax	84
	23.06.93	Tel. District court/Fax dtl.	24
	24.06.93	Fax send	6
	16.07.93	Fax dtl./study court orders	54
	20.07.93	Tel. Honegger	18
	20.07.93	legal research re doc.production	24
	22.07.93	legal research in supr.Court library	90
	22.07.93	Tel Distr.Court	72
	30.07.93	Fax Swift + Atty in Geneva	48
	30.07.93	Tel. an Swift	18
	30.07.93	Tel. judge Geneva	18
	17.08.93	Tel. Swift	18
	19.08.93	legal res. re attachment	60
	19.08.93	Tel. Trib.de Fribourg	18
	19.08.93	Tel. Swift	6
	19.08.93	Tel. Tribunal de Geneva	24
	23.08.93	2x Tel. und Fax atty.in Geneva	54
	03.09.93	study letter Distr. Court	12
	03.09.93	Fax dtl.	54
	06.09.93	Fax dtl./study orders sup.Court	18
	07.09.93	study file supr. Court	60
	07.09.93	get docs. from supreme court	48
	08.09.93	2x letter Supr. Court	12
	08.09.93	copy and contr. file of supr. Court	30
	09.09.93	Fax an Swift	48
	27.09.93	Fax dtl. Re contract 22.9.93	18
	28.09.93	contr. Translation orders	72
	29.09.93	review Fax Swift + reply	30
	29.09.93	study writ of appeal	60
	11.10.93	study order Supr. Court and court file	204
	11.10.93	Tel.court re costs and research	42
	11.10.93	Tel. Swift (2x)	24
	12.10.93	legal research in law inst., Fax	60
	13.10.93	legal research re appeal	270
	15.10.93	draft reply to appeal	420
	18.10.93	draft reply o appeal	498
	19.10.93	write reply to appeal	450
	19.10.93	Tel. dtl.	18
	20.10.93	Fax dtl.	18
	24.11.93	review order, letter. dtl.	60
	25.11.93	research re appeal	360
	25.11.93	Tel. translator + Fax	18
	26.11.93	Tel.Fed.Office of Justice , research	114
	29.11.93	Tel. Fed. Office of Justice, Tel. Swift, RS	84
	28.01.94	study order cass.Court	48
	08.02.94	Tel. Supr.Court	12

Mandatsbezeichnung.	Datum		Zeit in *
KSG/marcos	08.02.94	Tel. Swift	12
	10.02.94	study order supreme Court	24
	15.03.94	Tel. cit.	24
	17.03.94	study doc. re Freiburg	42
	17.03.94	Fax cit.	18
	30.03.94	Fax to Swift, study of file and law	318
	02.05.94	Tel. cit.	12
	18.02.95	study of judgement	24
	18.02.95	Tel. from cit.	42
	31.03.95	Tel. cit.	30
	02.06.95	study Fax v. 29.5.95, Tel. Swift	48
	28.08.95	Tel. Swift	18
	28.08.95	Tel. Cosandey Distr. Atty.	30
	29.08.95	Tel. Swift	20
	29.08.95	Fax to Swift	35
	29.08.95	Tel. M.Kurer	30
	05.09.95	Tel. from Swift from Manila	40
	14.09.95	Tel. Swift	10
	24.11.95	Tel. Swift	15
	25.01.96	Tel. Swift	40
	26.03.96	Conf. with Swift	150
	05.09.96	Tel. Distr. Atty.	15

Total Zeit in Minuten: 5299 Minuten  
Total Zeit in Stunden: Total hours: 88.32 Stunden / hours

Honorarberechnung für Mandat : Marcos

KSG/marcos

Stundensatz/hourly rate: SFr. 420.00  
Honorar netto: Fr. 37'093.00

EXHIBIT A

## Spesenabrechnung für Klient: KSG

Name des Berichtes:  
"Spesen für einen bestimmten Klienten"Name der Abfrage:  
Spesen für einen bestimmten Klienten

04. Mrz. 99

Mandats- Kurzbezeichnung	Datum	Spesentyp	Spesen-Nr	BetragBrutto	MwSt-Satz	MwSt-Betrag	BetragNetto	Vorsteuer	Konto
KSG/marcos	05.04.93	Tel. Swift	4150	SFr. 37.00	0.00%	Fr. 0.00	Fr. 37.00	Fr. 0.00	
	06.04.93	Tel. FOP/Sup.C./Distr.C.	4151	SFr. 10.00	0.00%	Fr. 0.00	Fr. 10.00	Fr. 0.00	
	07.04.93	Tel. Klt. + Fax	4152	SFr. 34.80	0.00%	Fr. 0.00	Fr. 34.80	Fr. 0.00	
	19.04.93	Tel. Klt.	4153	SFr. 11.50	0.00%	Fr. 0.00	Fr. 11.50	Fr. 0.00	
	28.04.93	Tel. Klt.	4154	SFr. 15.30	0.00%	Fr. 0.00	Fr. 15.30	Fr. 0.00	
	10.05.93	Tel. Swift	4156	SFr. 21.40	0.00%	Fr. 0.00	Fr. 21.40	Fr. 0.00	
	10.05.93	Tel. Cosandey	4155	SFr. 1.40	0.00%	Fr. 0.00	Fr. 1.40	Fr. 0.00	
	23.06.93	Tel. Distr.C./Fax Klt.	4157	SFr. 3.70	0.00%	Fr. 0.00	Fr. 3.70	Fr. 0.00	
	16.07.93	Fax Klt.	4158	SFr. 3.50	0.00%	Fr. 0.00	Fr. 3.50	Fr. 0.00	
	22.07.93	Tel. Distr.C., Frau Roth	4159	SFr. 5.00	0.00%	Fr. 0.00	Fr. 5.00	Fr. 0.00	
	30.07.93	Fax Swift + T.	4160	SFr. 5.70	0.00%	Fr. 0.00	Fr. 5.70	Fr. 0.00	
	30.07.93	Tel. an Swift	4161	SFr. 20.00	0.00%	Fr. 0.00	Fr. 20.00	Fr. 0.00	
	30.07.93	Tel. Geneva	4162	SFr. 2.00	0.00%	Fr. 0.00	Fr. 2.00	Fr. 0.00	
	19.08.93	Tel. Swift	4163	SFr. 4.00	0.00%	Fr. 0.00	Fr. 4.00	Fr. 0.00	
	03.09.93	Fax Klt.	4164	SFr. 10.90	0.00%	Fr. 0.00	Fr. 10.90	Fr. 0.00	
	06.09.93	Fax Klt./Jord	4165	SFr. 8.70	0.00%	Fr. 0.00	Fr. 8.70	Fr. 0.00	
	08.09.93	copies file sup.C.	4166	SFr. 60.00	0.00%	Fr. 0.00	Fr. 60.00	Fr. 0.00	
	13.09.93	Fax an Swift	4168	SFr. 7.10	0.00%	Fr. 0.00	Fr. 7.10	Fr. 0.00	
	27.09.93	Federal-Express	4169	SFr. 40.00	0.00%	Fr. 0.00	Fr. 40.00	Fr. 0.00	
	27.09.93	Fax Klt. betr. Vertrag	4170	SFr. 8.10	0.00%	Fr. 0.00	Fr. 8.10	Fr. 0.00	
	29.09.93	Fax an Swift	4171	SFr. 7.50	0.00%	Fr. 0.00	Fr. 7.50	Fr. 0.00	
	29.09.93	Fax an Swift + copies	4172	SFr. 42.80	0.00%	Fr. 0.00	Fr. 42.80	Fr. 0.00	
	30.09.93	Fax senden	4173	SFr. 30.90	0.00%	Fr. 0.00	Fr. 30.90	Fr. 0.00	
	11.10.93	Kopien, Porto	4174	SFr. 59.00	0.00%	Fr. 0.00	Fr. 59.00	Fr. 0.00	
	11.10.93	Fax Klt.	4175	SFr. 29.00	0.00%	Fr. 0.00	Fr. 29.00	Fr. 0.00	
	12.10.93	Fax	4176	SFr. 8.50	0.00%	Fr. 0.00	Fr. 8.50	Fr. 0.00	
	19.10.93	copies appeal reply	4177	SFr. 18.00	0.00%	Fr. 0.00	Fr. 18.00	Fr. 0.00	
	19.10.93	Tel. Klt., Porto	4178	SFr. 12.00	0.00%	Fr. 0.00	Fr. 12.00	Fr. 0.00	
	20.10.93	Porto, Fax Klt.	4180	SFr. 32.20	0.00%	Fr. 0.00	Fr. 32.20	Fr. 0.00	
	20.10.93	Fax Klt.	4179	SFr. 9.70	0.00%	Fr. 0.00	Fr. 9.70	Fr. 0.00	
	30.11.93	Fax	4181	SFr. 21.20	0.00%	Fr. 0.00	Fr. 21.20	Fr. 0.00	
	28.01.94	Fax Swift	4182	SFr. 25.50	0.00%	Fr. 0.00	Fr. 25.50	Fr. 0.00	
	08.02.94	Tel. Obergericht	4183	SFr. 1.00	0.00%	Fr. 0.00	Fr. 1.00	Fr. 0.00	
	08.02.94	Tel. Swift	4184	SFr. 7.00	0.00%	Fr. 0.00	Fr. 7.00	Fr. 0.00	
	15.03.94	Tel. Klt.	4185	SFr. 16.00	0.00%	Fr. 0.00	Fr. 16.00	Fr. 0.00	
	02.05.94	Fax	4186	SFr. 6.40	0.00%	Fr. 0.00	Fr. 6.40	Fr. 0.00	
	29.08.95	Fax	644	SFr. 11.20	6.50%	Fr. 0.68	Fr. 10.52	Fr. 0.00	
	18.09.95	Fax	695	SFr. 5.90	6.50%	Fr. 0.36	Fr. 5.54	Fr. 0.00	
	26.03.96	fotocopies	1354	SFr. 20.00	6.50%	Fr. 1.22	Fr. 18.78	Fr. 0.00	
	06.05.96	Fax	1621	SFr. 7.70	6.50%	Fr. 0.47	Fr. 7.23	Fr. 0.00	
	05.09.96	Tel. BS	1885	SFr. 15.20	6.50%	Fr. 0.93	Fr. 14.27	Fr. 0.00	

Mandats- Kurzbezeichnung	Datum	Spesentyp	Spesen-Nr	BetragBrutto	MwSt-Satz	MwSt-Betrag	BetragNetto	Vorsteuer	Konto
Total Mandat:	KSG/mar			Fr. 696.80		Fr. 3.66	Fr. 693.14	Fr. 0.00	
Total Klient:	KSG			Fr. 696.80		Fr. 3.66	Fr. 693.14	Fr. 0.00	
	Endsumme:			Fr. 696.80		Fr. 3.66	Fr. 693.14	Fr. 0.00	